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Attorneys for Defendant
National Consumer Telecom & Utilities Exchange, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JORGE OCHOA JR.,

Plaintiff,

v.

NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC, AT & T
MOBILITY, LLC, DISH NETWORK,
LLC, DIRECTV LLC, AND
BACKGROUNDCHECKS.COM, LLC.

Defendants.

Case No. 2:22-cv-01430-ART-DJA

**STIPULATION FOR EXTENSION
OF TIME FOR NATIONAL
CONSUMER TELECOM &
UTILITIES EXCHANGE, INC. TO
FILE RESPONSE TO COMPLAINT**

(FIRST REQUEST)

Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff Jorge Ochoa Jr. (“Plaintiff” or “Ochoa”), by and through her counsel of record, the law firm of Kind Law and Freedom Law Firm hereby stipulates and agrees as follows:

WHEREAS, Plaintiff filed its Complaint on September 2, 2022;

WHEREAS, Defendant NCTUE’S deadline to respond to Plaintiff’s Complaint is October 3, 2022;

WHEREAS, due to the recent retention of counsel, NCTUE’s counsel needs additional time to investigate and prepare a response to the Complaint;

WHEREAS, Plaintiff has agreed to give Defendant NCTUE up through and including November 2, 2022 in which to respond to Plaintiff’s Complaint;

1 WHEREAS, there are no other deadlines that are affected by this stipulation that are
2 presently known to the parties; and

3 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

4 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up
5 through November 2, 2022 in which to respond to Plaintiff's Complaint.

6 DATED 21 day of September, 2022

DATED 21 day of September, 2022

7 Respectfully Submitted by:

Approved by:

8 **GREENE INFUSO, LLP**

KIND LAW

9
10 /s/ Michael V. Infuso
11 Michael V. Infuso, Esq.
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3030 South Jones Blvd. Suite 101
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/s/ Michael Kind
Michael Kind, Esq.
Nevada Bar No. 13903
8860 S. Maryland Pkwy, Suite 106
Las Vegas, Nevada 89123

DATED 21 day of September, 2022

FREEDOM LAW FIRM

/s/ Gerardo Avalos
George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, esq.
Nevada Bar No. 15171
8985 S. Eastern Ave., Suite 350
Las Vegas, Nevada 89123

21 **ORDER**

22 **IT IS SO ORDERED.**

23 DATED this 21st day of September, 2022.

24 
25 _____
26 DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE
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